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BEFORE THE ARIZONA CORPORATION COMMISSION

MIKE GLEASON
Chairman
WILLIAM MUNDELL
Commissioner
JEFF HATCH-MILLER
Commissioner
KRISTIN MAYES
Commissioner
GARY PIERCE
Commissioner

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AZ CORP COMMISSION
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Arizona Corporation Commission

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**IN THE MATTER OF INVESTIGATION INTO
U S WEST COMMUNICATIONS, INC.'S
COMPLIANCE WITH CERTAIN
WHOLESALE PRICING REQUIREMENTS
FOR UNBUNDLED NETWORK ELEMENTS
AND RESALE DISCOUNTS**

DOCKET No. T-00000A-00-0194

**INITIAL RESPONSE OF QWEST
CORPORATION TO COMMISSION
STAFF'S MOTION TO
CONSOLIDATE DOCKETS AND
RESPONSE TO COX ARIZONA
TELCOM'S MOTION TO
COMMENCE PHASE III OF THE
QWEST UNE PRICING DOCKET**

On April 5, 2007, Qwest Corporation ("Qwest") received in the mail the Commission Staff's Motion to Consolidate Dockets and Response to Cox Arizona Telcom's Motion to Commence Phase III of the Qwest UNE Pricing Docket ("Staff's Motion"), seeking to institute a new phase in the wholesale cost docket, which for the most part has been inactive for five years. Staff requests that a Procedural Conference be held On April 16, 2007. Qwest hereby files its initial comments in opposition to the quick scheduling proposed by the Staff. For the reasons stated below, a Procedural Conference on April 16 is not possible. Qwest asks for the opportunity for Qwest, Staff, and other industry participants to consult and coordinate the date for an initial procedural conference and subsequent procedural schedule, and to make a joint scheduling proposal to the Hearing Division, if possible.

1 Prior to receiving Staff's Motion, Qwest had no indication that the Staff considered the
2 Phase III Cost Docket to be a priority matter, much less that it should be processed as if it were
3 an emergency. Qwest has not had adequate opportunity to consider the scope of issues it
4 believes should be addressed, to assess the resources that will be required, or to determine when
5 the people who must be involved in the case are available.

6 The Staff did not consult with Qwest regarding its proposed schedule. On the same day
7 that Staff seeks to have a Procedural Conference to initiate Phase III of the Cost Docket, Qwest
8 counsel will be in San Francisco, California, in connection with the oral argument at the Ninth
9 Circuit Court of Appeals in Qwest Corporation v. Arizona Corporation Commission, et al, and
10 Mountain Telecommunications, Inc. (Court of Appeals No. 05-15157), which is coincidentally a
11 case that arose out of the Phase II Cost Docket. Therefore, a Procedural Conference on April 16
12 is not possible for Qwest.

13 The scope of a potential Phase III Cost Docket is outlined in vague terms in the Staff
14 Motion. Qwest respectfully submits that the matters that might be addressed in Phase III deserve
15 deliberate thought and care, and that the Staff's proposed schedule is unduly precipitous. As the
16 Commission is aware, Cost Dockets are complicated, intensive, time-consuming regulatory
17 proceedings. Accordingly, the Commission should establish a schedule that provides ample time
18 for Qwest and other industry participants to participate in a meaningful way.

19 For the reasons stated above, a Procedural Conference on April 16 is not possible. Qwest
20 proposes that Qwest, Staff, and other industry participants first attempt to work together to
21 coordinate the date for an initial procedural conference and procedural schedule, and if
22 agreement can be reached, make a proposal to the Commission.

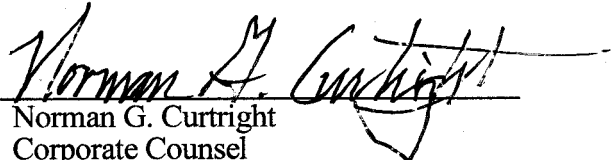
23 Qwest respectfully asks that it be allowed to reserve the opportunity to file further
24 comments in Response to the Staff's Motion, concerning the scope of the matters that might be
25 included in any cost docket proceeding.

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RESPECTFULLY SUBMITTED, this 10th day of April, 2007.

QWEST CORPORATION

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ORIGINAL and 13 copies hand-delivered
for filing this 10th day of April, 2007, to:

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Copy of the foregoing hand-delivered
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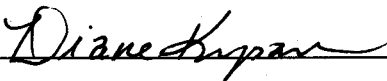
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